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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
Northern Division

UNITED STATES OF AMERICA,  
Plaintiff,

v.

ALL OF THE FUNDS AND PROPERTY  
IN TWO ACCOUNTS AT PNC BANK  
(EUN SOOK LEE),  
Defendant.

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Civil No. WDQ-05-745

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MOTION FOR  
FINAL ORDER OF FORFEITURE

Plaintiff, the United States of America, through undersigned counsel, hereby requests an order of forfeiture, and in support therefor states as follows:

1. The Verified Complaint for Forfeiture of the defendant property, which, the government submits, sets forth probable cause for the forfeiture of the defendant property, was filed on or about March 16, 2005.

2. On or about April 1, 2005, the United States Immigration and Customs Enforcement arrested or executed process on the defendant property in accordance with Rule C of the Supplemental Rules for Certain Admiralty and Maritime Claims.

3. The property was seized from the accounts of Eun Sook Lee located in Passaic, New Jersey, based on facts that developed in Baltimore County, Maryland. On or about April 26, 2005, an attorney for Eun Sook Lee filed a claim in this case. On or about

October 21, 2005, the government filed a motion to strike the claim of Eun Sook Lee, and the motion was granted by order dated November 10, 2005. A copy of the order is annexed hereto as **Exhibit A**.

4. Notice of the pendency of this forfeiture was published in the Baltimore Sun, a newspaper of general circulation in the Baltimore County area, on or about November 22, 2005, and was published in the Passaic Record, a newspaper of general circulation in the Passaic County, New Jersey, area, on or about November 26, 2005, pursuant to Rule C of the Supplemental Rules For Certain Admiralty and Maritime Claims, and pursuant to Local Admiralty Rule (c)(2). Copies of the advertising certifications are annexed hereto as **Exhibit B**.

6. No claimant, other than Eun Sook Lee has come forward within the time allotted by law for the filing of claims, which is within thirty (30) days of the service of process or of publication. 18 U.S.C. section 983(a)(4)(A).

**WHEREFORE**, the government respectfully requests that the Court issue a final order of forfeiture in conformance with the attached draft order that is submitted for the convenience of the Court.

Respectfully submitted,

Rod J. Rosenstein  
United States Attorney

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//s//  
Richard C. Kay  
Assistant United States Attorney  
36 South Charles Street

Fourth Floor  
Baltimore, Maryland 21201  
(410) 962-4822 Bar No. 06766

**CERTIFICATE OF SERVICE**

I hereby certify that on January 6, 2006, a copy of the  
forgoing Motion for Final Order of Forfeiture was sent to:

John P. Pierce, Esquire  
4641 Montgomery Avenue  
Suite 500  
Bethesda, Maryland 20814

    //s//      
Richard C. Kay  
Assistant United States Attorney